



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105-3901**

October 18, 2016

Certified Mail: 7013 1090 0000 1618 3325

Mr. Clement Alberts  
Environmental Coordinator  
Pacific Offshore Operators, LCC  
1145 Eugenia Place, Suite 200  
Carpinteria, CA 93013

Re: Request for Information under Clean Water Act Section 308(a) – Pacific Offshore Operators, LLC, EPA Docket No. CWA 308-9-17-004

Dear Mr. Alberts:

In our March 7 and 10, 2016 NPDES compliance evaluation inspection of Platform Hogan and La Conchita Onshore Treatment Plant owned and operated by Pacific Offshore Operators, LLC ("POOI"), inspectors from the U.S. Environmental Protection Agency, Region 9 ("EPA") documented several findings related to POOI's process wastewater treatment and effluent monitoring and reporting. These findings, documented in our inspection report dated July 25, 2016, included a failing vessel within the process wastewater treatment train, poor monitoring and reporting practices, and potential evidence of an effluent limit exceedance not reported in the respective Discharge Monitoring Report (DMR), among other concerns. In sum, these findings, along with POOI's August 17, 2016 response to the EPA inspection report, may show systemic problems with POOI's approach to NPDES permit compliance. The attached Request for Information will help EPA Region 9 further assess POOI's compliance with NPDES permit No. CAG280000 and the Clean Water Act.

Pursuant to the Agency's information-gathering authority under Section 308 of the Clean Water Act, 33 U.S.C. § 1318, EPA hereby requests that POOI provide the information specified in Attachment 1 by the specified dates therein.

Please send your response to:

Colby Tucker, ENF-3-1  
U.S. Environmental Protection Agency  
Region IX  
Enforcement Division  
75 Hawthorne Street  
San Francisco, CA 94105  
Tucker.WilliamC@epa.gov

Please note you may satisfy part or all of this request digitally.

All submittals in response to this letter must be accompanied by the following certification signed by a responsible officer in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

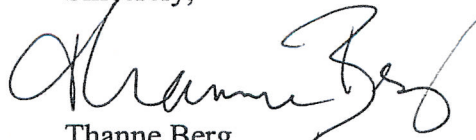
POOI may not withhold from EPA any information on the grounds that it is confidential business information. However, EPA has promulgated, under 40 C.F.R. Part 2, Subpart B, regulations to protect confidential business information it receives. A legally supportable claim of business confidentiality may be asserted in the manner specified by 40 C.F.R. § 2.203(b) for all or part of the information requested by EPA. EPA will disclose business information covered by such claim only as authorized by 40 C.F.R. Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice.

Failure to comply with this Request for Information can result in enforcement action for appropriate remedy, including penalties, under Section 309 of the CWA, 33 U.S.C. § 1310. Compliance with this Request for Information does not relieve POOI of its obligation to comply with the CWA or other applicable laws and permits.

The Request for Information is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act because it is directed to fewer than ten persons and is therefore not a "collection of information" under 44 U.S.C. § 3502(3). It is also an exempt activity under 44 U.S.C. § 3518(c) and 5 C.F.R. § 1320.4.

Thank you for your cooperation and prompt attention to this letter as it is a matter of public health and protection of vital environmental resources. If you have any questions regarding this Request for Information, please contact Colby Tucker of my staff at 415-972-3556 or Tucker.WilliamC@epa.gov. Legal questions regarding this Request for Information should be directed to Melanie Shepherdson of the Office of Regional Counsel at 415-972-3923 or Shepherdson.Melanie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Thanne Berg", is written over a horizontal line.

Thanne Berg  
Acting Assistant Director, Water &  
Pesticides Branch  
Enforcement Division



Enclosure

Request for Information, EPA Docket No. CWA-308-17-004

Under the authority of Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), the United States Environmental Protection Agency, Region 9 ("EPA") requires Pacific Offshore Operators, LLC ("POOI") to provide to EPA the information described below (see "Request for Information"). This Request for Information in no way alters or relieves POOI of other legal responsibilities or restrictions imposed on operations at Platform Hogan or La Conchita Treatment Plant at the federal, state or local government level.

REQUEST FOR INFORMATION

Please provide the following information and documents. If POOI does not maintain the requested information and/or documents please state, "We do not have this requested information." Please note that you may be required to produce certain information if it is currently not maintained in your records.

PART A

By **November 1, 2016** please provide:

1. Provide the following information regarding the recycle tank in the process wastewater treatment train at POOI's La Conchita Onshore Treatment Plant (See EPA Inspection Report, Photograph 29 & 30):
  - The manufacturer,
  - All manufacturer's documentation on proper operation and maintenance,
  - The date of installation,
  - The size (volume),
  - Any POOI work orders (or other evidence) relating to operation and maintenance of the recycle tank, and
  - Future plans to address the recycle tank's current state of disrepair.
2. All records and communications (internal to POOI and external to Clean Seas and other federal agencies) relating to the February 2, 2016 spill from Platform Hogan.
3. Evidence (completed work orders, photographs, or combination thereof) of modifications to the Platform Hogan Reverse Osmosis unit waste stream piping to verify POOI's rerouting of this pipe to the Deck Drain.
3. Calibration logs for the HACH 2100Q turbidity meter and the LaMotte Smart 3 Colorimeter meter for the On-Line Oil and Grease Monitoring (Permit II.G.6 and III.F) at La Conchita Onshore Treatment Plant for the period of August 15, 2016 through October 15, 2016.
4. The most up-to-date standard operating procedures relating to POOI's NPDES discharge monitoring and reporting that include:

- Modifications to the Oil and Grease sampling,
  - Protocols relating to the chain of custody forms,
  - Any other modification stemming from the EPA's report on its March 2016 inspection.
5. All lab sheets (Fruit Growers Lab, chain of custody forms, and any others) associated with Discharge Number 002C-A (Oil and Grease) for the months of March, April, and May 2014.

## PART B

Increase oil and grease monitoring at La Conchita Onshore Treatment Plant (representative of Discharge 002 for Platform Hogan) from a minimum of 4 times per month to a minimum of 8 times per month between November 1, 2016 and January 31, 2017. Conduct sampling in accordance to EPA method 1664.

**By December 15, 2016:**

Submit to EPA the relevant chain of custody forms, laboratory sheets, and a spreadsheet with the results of the sampling with a monthly average from November 2016.

**By January 16, 2017:**

Submit to EPA the relevant chain of custody forms, laboratory sheets, and a spreadsheet with the results of the sampling with a monthly average from December 2016.

**By February 15, 2017:**

Submit to EPA the relevant chain of custody forms, laboratory sheets, and a spreadsheet with the results of the sampling with a monthly average from January 2017.